

21 MAG 08982

Approved: _____

JENNIFER N. ONG/NICHOLAS S. BRADLEY
Assistant United States Attorneys

Before: THE HONORABLE PAUL E. DAVISON
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA

: SEALED COMPLAINT

- v. -

: Violations of
21 U.S.C. §§ 841(a)(1),
: (b)(1)(C) and 846.

JAHLIL KING,

Defendant.

: COUNTY OF OFFENSE:
ORANGE

:

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SOUTHERN DISTRICT OF NEW YORK, ss.:

THOMAS L. ANDERSON, being duly sworn, deposes and says
that he is a Special Agent with the Federal Bureau of
Investigation ("FBI") and charges as follows:

COUNT ONE
(Narcotics Conspiracy)

1. From at least in or about January 2020 up to and
including January 2021 in the Southern District of New York and
elsewhere, JAHLIL KING, the defendant, and others known and
unknown, intentionally and knowingly did combine, conspire,
confederate, and agree together and with each other to violate
the narcotics laws of the United States.

2. It was a part and an object of the conspiracy
that JAHLIL KING, the defendant, and others known and unknown,
would and did distribute and possess with intent to distribute a
controlled substance in violation of Title 21, United States
Code, Section 841(a)(1).

3. The controlled substance that JAHLIL KING, the
defendant, conspired to distribute and possess with the intent
to distribute was 280 grams and more of mixtures and substances
containing a detectable amount of cocaine base, in violation of
Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

COUNT TWO

(Possession with Intent to Distribute Narcotics)

4. On or about September 15, 2021, in the Southern District of New York and elsewhere, JAHILIL KING, the defendant, intentionally and knowingly possessed with the intent to distribute a controlled substance in violation of Title 21, United States Code, Section 841(a)(1).

5. The controlled substance that JAHILIL KING, the defendant, possessed with the intent to distribute was mixtures and substances containing a detectable amount of cocaine base, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Sections 841(a)(1) and
(b)(1)(C).)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

6. I am a Special Agent with the FBI, and I have been personally involved in the investigation of this matter. This Affidavit is based upon my personal participation in the investigation of this matter, my conversations with law enforcement agents and others, as well as my examination of reports and records. From this investigation, I have learned the following, among other things. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

7. Based on my review of reports and records, my involvement in this investigation, and my conversations with other law enforcement agents and individuals, I have learned the following, among other things:

- a. On or about September 15, 2021, the City of Newburgh Police Department ("CNPD") received a complaint that shots were fired in the vicinity of William Street and Benkard Avenue in the City of Newburgh, New York.

- b. Thereafter, CNPD law enforcement officers viewed video surveillance footage in the vicinity of William Street and Benkard Avenue. The video footage showed, among other things, that shortly after the shots fired complaint was received, a male individual was hiding behind a white van in an alleyway.
- c. As CNPD officers were viewing video surveillance footage, other CNPD officers responded to the vicinity of William Street and Benkard Avenue and observed a group of approximately five male individuals standing in the area. The CNPD officers approached the group to ask about the complaint of shots being fired in the area. As the officers were talking to the group, they received an alert over the police radio advising them that they should investigate the area behind a white van in an alleyway because a male individual was seen on the surveillance footage hiding behind that van after the shots were reported.
- d. One of the male individuals in the group that was talking to the CNPD officers, later identified as JAHLIL KING, the defendant, heard this alert over the police radio and fled. CNPD officers pursued KING and later apprehended him. KING was later identified as the same individual that CNPD officers saw hiding behind the white van on the video surveillance footage.
- e. Law enforcement officers subsequently investigated the area behind the white van in the alleyway and found a white, chunk-like substance in a plastic bag that they recognized based on their training and experience to be consistent with the appearance of crack cocaine. The white, chunk-like substance field tested positive for the presence of cocaine and weighed approximately 8 grams.¹

¹ Based on my training and experience, as well as my discussions with other law enforcement officers, I know that the field testing reagent used does not distinguish between the base and powder forms of cocaine.

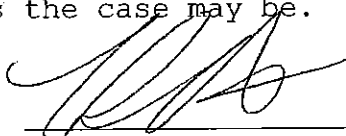
8. Subsequent to his arrest, JAHLIL KING, the defendant, waived his *Miranda* rights and agreed to speak with law enforcement, which was audio and video recorded. Based on my conversations with other law enforcement officers and my review of the recorded interview, I have learned that KING told law enforcement the following, in part and in substance:

- a. The white, chunk-like substance found in the alleyway on or about September 15, 2021 belonged to KING, who admitted that the substance was crack cocaine.
- b. From approximately January 2020 to January 2021, KING, along with other individuals, sold approximately 20 grams of crack cocaine every day in and around the City of Newburgh.
- c. From approximately July 2021 to the present, KING admitted to selling crack cocaine in and around the City of Newburgh.

9. Based on my training and experience, and the post-arrest, *Mirandized*, recorded statement of JAHLIL KING, the defendant, I believe that the quantity of crack cocaine found in the alleyway on or about September 15, 2021, is consistent with re-sale (not personal use).

[Continued on next page.]

WHEREFORE, deponent respectfully requests that an arrest warrant be issued for JAHLIL KING, the defendant, and he be imprisoned or bailed, as the case may be.



THOMAS L. ANDERSON
Special Agent
Federal Bureau of Investigation

Sworn to me this
16th day of September, 2021.



THE HONORABLE PAUL E. DAVISON
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK